

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>In re:</p> <p>STREAM TV NETWORKS, INC., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>(Jointly Administered)</p> <p>Case No. 23-10763 (MDC)</p>
<p>STREAM TV NETWORKS, INC., and TECHNOVATIVE MEDIA, INC.</p> <p>Plaintiffs,</p> <p>v.</p> <p>SHADRON L. STASTNEY, SLS HOLDINGS VI, LLC, HAWK INVESTMENT HOLDINGS LIMITED, ARTHUR LEONARD ROBERT “BOB” MORTON, SEECUBIC, INC., ALASTAIR CRAWFORD, KRZYSZTOF KABACINSKI, KEVIN GOLLOP, ASA GOLA, JOHN DOE(S), JANE DOE(S), DELAWARE and OTHER LAW FIRMS representing and acting in concert with John Doe(s) and/or Jane Doe(s), INVESTMENT BANKS employed by John Doe(s) and/or Jane Doe(s), PATRICK THEUNE, and SEECUBIC B.V.,</p>	<p>A.P. No. 23-00057-mdc</p>
<p>Defendants.</p>	

**DEFENDANTS HAWK INVESTMENT HOLDINGS LIMITED
AND ARTHUR LEONARD ROBERT MORTON’S MOTION TO
DISMISS PLAINTIFFS’ COMPLAINT FOR LACK OF PERSONAL JURISDICTION,
FAILURE TO OBTAIN SERVICE, AND FOR FAILURE TO STATE A CLAIM**

¹ The Debtors, along with the last four digits of the Debtors’ federal tax identification number are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

Defendants Hawk Investment Holdings Limited (“Hawk”) and Arthur Leonard Robert Morton (“Mr. Morton”) submit this motion pursuant to Rule 12(b)(2), 12(b)(5), and 12(b)(6) of the Federal Rule of Civil Procedure (the “Rules”)² to dismiss the complaint [AP Docket No. 1] (the “Complaint”) filed by Stream TV Network, Inc. (“Stream”) and Technovative Media, Inc. (“Technovative” and, together with Stream, the “Plaintiffs” or “Debtors”).

The grounds for the Motion for lack of personal jurisdiction, insufficient service, and failure to state a claim upon which relief can be granted are set forth more fully in the *Brief in Support of Defendants Hawk Investment Holdings Limited and Arthur Leonard Robert Morton’s Motion to Dismiss Plaintiffs’ Complaint for Lack of Personal Jurisdiction, Failure to Obtain Service, and for Failure to State a Claim* (the “Brief”)³ filed contemporaneously herewith.

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² FRCP 12(b) is applicable to this proceeding pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

³ Capitalized terms used but not defined herein shall have the meanings given to them in the Brief.

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and Arthur Leonard Robert Morton*